

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TRAVIS E. WALKER

Defendant.

CASE NO. **3:18-cr-75**

JUDGE

WALTER H. RICE

INDICTMENT

18 U.S.C. § 2251(a) and (e)

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(a)(4)(B)

FORFEITURE ALLEGATION

THE GRAND JURY CHARGES:

COUNT 1

[18 U.S.C. §§ 2251(a) and (e)]

Beginning on an exact date unknown, but at least by on or about January 15, 2018, continuing up to and including on or about February 18, 2018, in the Southern District of Ohio, the defendant, **TRAVIS E. WALKER**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, namely, "Minor A," to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 2

[18 U.S.C. §§ 2251(a) and (e)]

Beginning on an exact date unknown, but at least by on or about January 15, 2018, continuing up to and including on or about February 26, 2018, in the Southern District of Ohio, the defendant, **TRAVIS E. WALKER**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, namely, “Minor A,” to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 3

[18 U.S.C. §§ 2251(a) and (e)]

Beginning on an exact date unknown, but at least by on or about January 15, 2018, continuing up to and including on or about April 8, 2018, in the Southern District of Ohio, the defendant, **TRAVIS E. WALKER**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, namely, “Minor A,” to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 4

[18 U.S.C. §§ 2251(a) and (e)]

On or about May 7, 2018, in the Southern District of Ohio, the defendant, **TRAVIS E. WALKER**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, namely, “Minor A,” to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 5

[18 U.S.C. §§ 2252(a)(2) and (b)(1)]

On or about May 7, 2018, in the Southern District of Ohio, the defendant, **TRAVIS E. WALKER**, knowingly distributed any visual depiction using any means and facility of interstate and foreign commerce, and which visual depiction had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which have been mailed and shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction are of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT 6

[18 U.S.C. § 2252(a)(4)(B) and (b)(2)]

On or about May 7, 2018, in the Southern District of Ohio, the defendant, **TRAVIS E. WALKER**, knowingly possessed at least one matter which contains any visual depiction that had been shipped and transported using any means and facility of interstate and foreign commerce and was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

FORFEITURE ALLEGATION 1

Upon conviction of Counts 1, 2, 3, 4, 5, and/or 6 of this Indictment, the defendant, **TRAVIS E. WALKER**, shall forfeit to the United States pursuant to 18 U.S.C. § 2253(a): (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B or 2260 of Chapter 110 of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18 of the United States Code; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to a LG cellular telephone, Model LS992, bearing MEID 089482906302322840 and IMSI 310120141719692.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

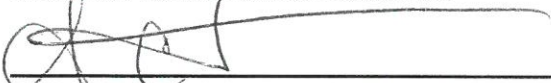
it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b), to seek forfeiture of any other property of the defendant, up to the value of the property described above.

A TRUE BILL



FOREPERSON

**BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY**



**SAMEE HARDEN, (DC 1005658)
Assistant United States Attorney**